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REMARKS

This is in response to the Office Action dated March 9, 2005. In the Office Action, claims 1, 2 and 5 were rejected and claims 3-4 and 6-8 were objected to. With this response, claim 1 has been amended. Claims 2-8 remain unchanged.

35 U.S.C. § 112 Claim Rejections

Claims 1-8 were rejected under 35 U.S.C. § 112. The claims have been amended and it is believed that the rejection can be withdrawn.

35 U.S.C. § 103 Claim Rejections

Claims 1-2 were rejected under 35 U.S.C. § 103(a) in various combinations of Kim et al., Brown et al. and Lee. According to the Manual of Patent Examining Procedure (MPEP), in order to establish a *prima facie* case of obviousness in instances where multiple references are cited in combination, the Examiner must show that the references teach or suggest all the recited claim limitations. See MPEP §2143. The Examiner has not supported a *prima facie* case of obviousness.

It is respectfully submitted that the combination of Kim et al. and Brown et al. or Lee fail to teach or suggest all the recited claim elements. Specifically, these references do not show:

- computing an external disturbance model;
- computing an internal disturbance model;
- defining an inertia matrix;
- defining a state estimator based on the inertia matrix and external and internal disturbance models to minimize a defined norm of a state estimation error;
- calculating the gain of the state estimator as a solution to a filter algebraic Ricatti equation;
- designing an optimal vibration mount; and
- defining optimal mounting damping and stiffness parameters based on the calculated state estimator gain.

Applicant has reviewed Kim et al., Brown et al. and Lee has found none of these elements. Not only

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are these elements not shown at all, but they are certainly not shown in the context of a disc drive. Thus, even if one were to combine the references, there is no way that one would arrive at the claimed invention. Further, there is no motivation to combine the two references. The references are in two completely different fields. Therefore, the rejection must be withdrawn.

In view of the above amendments and remarks, it is respectfully submitted that all pending claims are in condition for allowance. Favorable action is respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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